

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

SARAH MOLINA, et al.,)	
)	
Plaintiffs,)	
)	Case No.: 4:17-cv-2498 AGF
v.)	
)	
CITY OF ST. LOUIS, MISSOURI, et al.,)	
)	
Defendants.)	

Motion for Leave to File Exhibits Under Seal

Plaintiffs request leave to file several exhibits under seal. In support, they state:

1. Exhibits 3, 24, and 28 are documents produced by Defendants with a designation of “Confidential” pursuant to the Protective Order in this action, ECF No. 150.
2. Exhibit 29 is a photograph produced by Plaintiffs of Groce’s injury, which is in a sensitive area of Groce’s body, and was therefore marked as “Confidential.”
3. Under the Protective Order, “[i]f it becomes necessary to file Discovery Materials that contain ‘Confidential’ or ‘Attorneys Eyes Only’ information with the Court, the party seeking to file those Materials may move the Court for an order that the Materials be received and maintained by the Clerk under seal pursuant to E.D.Mo. L.R. 13.05.”

WHEREFORE Plaintiffs respectfully move the Court for an order that Exhibits 3, 24, 28, and 29 be received and maintained by the Clerk under seal pursuant to E.D.Mo. L.R. 13.05.

Respectfully submitted,

By: /s/ Anthony E. Rothert
Anthony E. Rothert, #44827

Jessie Steffan, #64861
Omri E. Praiss, #41850
Kayla M. DeLoach, #72424
American Civil Liberties Union
of Missouri Foundation
906 Olive Street, Suite 1130
St. Louis, Missouri 63108
Phone: (314) 652-3114
Fax: (314) 652-3112
trothert@aclu-mo.org
jsteffan@aclu-mo.org
kdeloach@aclu-mo.org

Gillian R. Wilcox, #61278
American Civil Liberties Union
of Missouri Foundation
406 West 34th Street, Suite 420
Kansas City, Missouri 64111
Phone: (816) 470-9938
Fax: (314) 652-3112
gwilcox@aclu-mo.org